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April 24, 2014

Via ECF & Regular Mail

Hon. Alvin K. Hellerstein, U.S.D.J.
United States District Court, S.D.N.Y.
500 Pearl Street
New York, New York 10007

*Re: Roman et al v. The Dinex Group, LLC et al
Civil Action No.: 12 Civ. 6156 (AKH)
F&S File No.: 66-321
Assigned Attorney: Brian S. Schaffer*

Dear Judge Hellerstein:

We represent the Plaintiffs in the above-referenced action. As Your Honor may recall, the parties' revised settlement and Notice of Settlement was approved by the Court on April 4, 2014. *See* ECF No. 139. Though not specifically addressed in the parties' settlement agreement, Plaintiffs sought to send the Notice of Settlement in both English and Spanish, as many of the individuals who opted in to the case are native Spanish speakers who are not entirely fluent in the English language. Defendants, however, informed us today that they will not consent to a mailing of a Spanish-translated Notice of Settlement. The only explanation given for their position was that defense counsel "did not separately agree to a translation/mailing of the notice." Given that the goal of the Settlement Notice is to ensure that all members of the collective fully understand their rights and obligations with respect to the settlement, Plaintiffs do not see any reasonable rationale for Defendants' objection. Rather, Plaintiffs firmly believe that sending a Spanish version of the Settlement Notice furthers the goals of the Settlement Notice, as well as those expressed by the Court during the February 4, 2014 hearing, and is in the best interest of both parties. Accordingly, we respectfully request the Court's permission to mail the Notice of Settlement to collective members in both English and Spanish.

We thank the Court in advance for its time and consideration.

Respectfully yours,

Brian S. Schaffer

cc: Defense Counsel (via ECF)